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STATE OF MAINE

# Department of Environmental Protection

MAIN OFFICE: RAY BUILDING, HOSPITAL STREET, AUGUSTA  
 MAIL ADDRESS: State House Station 17, Augusta, 04333

207-PRR 7688

JOHN A. McKERNAN, JR.  
 GOVERNOR

DEAN C. MARRIOTT  
 COMMISSIONER

June 30, 1992

Mr. James Shafer  
 Department of the Navy  
 Northern Division 77-L  
 Naval Facilities Engineering Command  
 Philadelphia, PA 19112-5094

Subject: Proposed Plan Site #8 Brunswick NAS

Dear Jim,

The Maine Department of Environmental Protection has reviewed the Proposed Plan for Site #8 at Brunswick Naval Air Station and finds the plan adequate and with sufficient details for the public. The department does however request a change in the Proposed Plan to increase the thickness of the landfill cap from the proposed 6" of topsoil to 18" of low permeability soil capped with 6" of topsoil. We believe this change is more protective of public health, safety and groundwater quality and in addition, complies with the intent of the Maine Solid Waste Management Regulations.

The two enclosed review memos from our technical staff outline the reasoning for our requested change. In general, the occurrence of leachate breakouts along the eastern edge of the site, PAH's in the soils, and DDT in leachate sediments suggest that the site contains waste in addition to normal construction and demolition debris. Chapter 404 of the Maine Solid Waste Management Regulations applies to only construction and demolition landfills. Chapter 401 of the regulations is more appropriate for this type of landfill. The FS for Site #8 (page 3-15, paragraph #2) states that "Standards for an attenuation landfill, which does not require an impermeability cover system may be the most relevant standards for consideration." Chapter 401.7 (C) (2b) of the regulations contain the specifications for final cover for attenuation landfills. Dick Behr's memo suggests that the increased cost of this change is estimated at \$25,000 to 30,000.

I hope these comments are timely and that our requested change. Please contact

and fax transmittal memo 7671 # of pages >

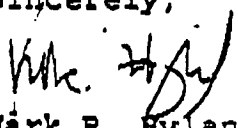
LL WEBER		From	TIM SHAFER
FBB		Co.	
Dept.		Phone #	215 897 6432
Fax #	207 772 4762	Fax #	

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questions or wish to discuss this further. Thank you for  
your call.

Sincerely,

  
Mark R. Hyland, Director  
Federal Facilities Remediation  
Office of the Commissioner